

GRI Context Index: 2020 TDC NET Annual Report

TDC NET's Annual Report 2020 has been prepared in accordance with the GRI Standard: Core option. The following standards have been identified as material to our ESG related reporting.

GRI Standard	Disclosure Number	Disclosure Title	Reporting Location	Omissions
General Disclosures	102-1	Name of the organization	TDC NET A/S	
General Disclosures	102-2	Activities, brands, products, and services	For more than a century, we have helped bring Denmark closer together. Since 1882, when the visionary C.F. Tietgen established Københavns Telefon-Selskab and made his first calls and to the present day, where we work around the clock to ensure that the entire country is connected. Today, TDC NET is an independent company owning, operating and building digital infrastructure in Denmark. TDC NET is the undisputed leader within mobile network quality in Denmark. This position has been recognised six years running by independent tests showing a material edge in both quality and coverage. Please see pages 11 to 14 of our Annual Report.	
General Disclosures	102-3	Location of headquarters	TDC NET A/S, Teglhølmegade 1, 0900 København C	
General Disclosures	102-4	Location of operations	Denmark	
General Disclosures	102-5	Ownership and legal form	TDC NET A/S is a privately held company owned by TDC A/S. Please see page 76 of the Annual Report.	
General Disclosures	102-6	Markets served	TDC NET serves Denmark with unparalleled connectivity infrastructure. We operate a nationwide copper network covering ~2.8m addresses in Denmark. We have Denmark's largest high-speed platform, offering 1 Gbps to more than 1.7 million addresses in Denmark. We have Denmark's best mobile network, offering speeds of up to 1 Gbps in the four biggest cities in Denmark and significantly	

			increased speeds in the rest of the country, with 5G coverage totalling 95%. Please see page 13 of the Annual Report.	
General Disclosures	102-7	Scale of the organization	Please see the Key performance indicators on page 9 of the Annual Report.	
General Disclosures	102-8	Information on employees and other workers	Please see the employee information on pages 102 and 103 of the Annual Report. Information on how the figures are calculated is in our TDC NET ESG Accounting Principles .	
General Disclosures	102-9	Supply chain	In 2020, TDC NET had more than 2,500 suppliers providing products and services. With 80% of total spend spent on our top 36 suppliers. Our procurement team and vendor management team are responsible for establishing and managing these relationships. As a signatory to the UN Global Compact through TDC Group, we take our commitment to acting responsibly in line with these principles very seriously. We use the TDC Group Partner Code of Conduct to outline our requirements for TDC NET employees as well as our suppliers in relation to human rights, labour conditions, the environment, anti-corruption, health and safety, data protection and security. This is published on our website. As a supplier ourselves, TDC NET is assessed as a part of TDC Group through the EcoVadis ESG assessment. In 2020, we were ranked among the top 10% of evaluated suppliers for our ESG performance. Further information on our approach to Sustainable Procurement and Supply Chain is available on page 17 of our Annual Report.	
General Disclosures	102-10	Significant changes to the organization and its supply chain	Please see pages 12, 30 and 47 of our Annual Report.	
General Disclosures	102-11	Precautionary Principle or approach	TDC NET is committed to the UN Global Compact principles through TDC Group. The 7th principle is the support for application of the precautionary approach for environmental issues or concerns. Our commitment to the UN Global Compact is outlined on page 5 of the TDC Group sustainability policy and page 7 of the TDC Group Partner Code of Conduct. Both of which are available on TDC Group website. Please see the TDC Group Sustainability Policy on the TDC Group website.	

General Disclosures	102-12	External initiatives	TDC NET is committed to the UN Global Compact and is a member of the UN Global Business Ambition for 1.5°C Pledge through TDC Group. Please see Memberships on page 30 of our Annual Report.	
General Disclosures	102-13	Membership of associations	Please see Memberships on page 30 of our Annual Report.	
General Disclosures	102-14	Statement from senior decision-maker	Please see Letter from Management on page 6 of our Annual Report.	
General Disclosures	102-15	Key impacts, risks, and opportunities	Please see Our Approach on page 26, Our Stakeholders on page 30 and ESG Risks on page 39 of our Annual Report. Please see Materiality on page 11 of the TDC Group Annual Report.	
General Disclosures	102-16	Values, principles, standards, and norms of behaviour	<p>We recognise that as part of society, we play an important role in operating responsibly, and as such, we are committed to taking a proactive approach. We comply with relevant laws and regulations but aspire to higher standards. It is critical that our partners, employees and customers trust us and feel secure when using our products and services. We actively engage with all our stakeholders to identify material issues and strategic priorities, and we are committed to the highest standards of ethical behaviour.</p> <p>Our approach to data security, privacy, and ethics is outlined in our various policies. We systematically manage risk and security, with regular assessments made both by in-house and external parties' continuous investment, and clear management focus on the topics, we have also developed a position on data ethics which is available on our website.</p> <p>As a leader in our sector, we are also proud to contribute to the Danish economy both directly and indirectly through our employees. We are committed to paying taxes in accordance with laws and regulations wherever we do business, and we have published our tax principles publicly to demonstrate our commitment to transparency. They are available on TDC Group's website.</p> <p>Our Partner Code of Conduct, which is also available on our website, outlines our requirements for TDC employees as well as our suppliers in relation to human rights, labour conditions, the environment, anti-corruption, health and safety, data protection and security.</p> <p>Please see Our Approach in the Operating Responsibly section and Sustainable Procurement on page 30 of our Annual Report and on page</p>	

			5 of the TDC Group Sustainability Policy which is available on the TDC Group website.	
General Disclosures	102-17	Mechanisms for advice and concerns about ethics	Please see our Whistleblower Policy available in both Danish and English on the TDC Group website, and pages 30 and 103 of our Annual Report.	
General Disclosures	102-18	Governance structure	Please see information on TDC Groups' Board of Directors on pages 35 to 37 of the TDC Group Annual Report and on the TDC Group website. (https://tdcgroup.com/en/who-we-are/corporate-governance). Please also see sustainability governance on page 10 of the TDC Group Annual Report.	
General Disclosures	102-19	Delegating authority	Please see Management Team on pages 7 and 8 and Sustainability Governance Structure on page 26 of our Annual Report.	
General Disclosures	102-20	Executive-level responsibility for economic, environmental, and social topics	Please see Management Team on pages 7 and 8 and Sustainability Governance Structure on page 26 of our Annual Report.	
General Disclosures	102-21	Consulting stakeholders on economic, environmental, and social topics	Please see Our Approach on page 26, and Our Stakeholders on page 30 of our Annual Report. Please see Materiality on page 11 of the TDC Group Annual Report.	
General Disclosures	102-22	Composition of the highest governance body and its committees	Please see information on TDC Groups' Board of Directors on pages 34 to 36 of the TDC Group Annual Report and on the TDC Group website. (https://tdcgroup.com/en/who-we-are/corporate-governance)	
General Disclosures	102-23	Chair of the highest governance body	Please see information on TDC Groups' Board Chairman on page 35 of the TDC Group Annual Report.	
General Disclosures	102-40	List of stakeholder groups	Please see Our Stakeholders on page 30 of our Annual Report.	
General Disclosures	102-41	Collective bargaining agreements	88% of TDC employees are covered by collective bargaining agreements. Please see page 39 of our Annual Report (Human Rights).	
General Disclosures	102-42	Identifying and selecting stakeholders	Please see Materiality on page 11 of the TDC Group Annual Report and Our Stakeholders on page 30 of our Annual Report.	

General Disclosures	102-43	Approach to stakeholder engagement	We engage with our stakeholders through formal and informal dialogues, through industry associations and working groups, in direct meetings and through our customer service calls and in our stores. Quantitative and qualitative engagement with stakeholders included surveys and interviews, and this input is integrated into how and what we work on. Due to the nature of 2020, the type and frequency of engagement changed dramatically throughout the year. Please see Materiality on page 11 of the TDC Group Annual Report and Our Stakeholders on page 30 of our Annual Report.	
General Disclosures	102-44	Key topics and concerns raised	Please see Materiality on page 11 of the TDC Group Annual Report and Our Approach on page 26 and Our Stakeholders on page 30 of our Annual Report.	
General Disclosures	102-45	Entities included in the consolidated financial statements	Please see Accounting Policies page 47 of our Annual Report.	
General Disclosures	102-46	Defining report content and topic Boundaries	Please see Materiality on page 11 of the TDC Group Annual Report.	
General Disclosures	102-47	List of material topics	Our material topics were identified as those that are of highest importance to both our stakeholders and the business. Please see Materiality on page 11 of the TDC Group Annual Report.	
General Disclosures	102-48	Restatements of information	No significant restatements have been made. Any changes to previous years data are as a result of emissions factors corrections/update, but these are below the threshold for materiality. Please see pages 1 and 2 of TDC NET ESG Accounting Principles .	
General Disclosures	102-49	Changes in reporting	For changes in reporting, please see pages 1 and 2 of TDC NET ESG Accounting Principles .	
General Disclosures	102-50	Reporting period	The performance content of this report is published annually. The data reported covers 1 January –31 December 2020. Please see reporting boundary on page 1 of TDC NET ESG Accounting Principles .	
General Disclosures	102-51	Date of most recent report	The most recent previous CSR performance report was published in the TDC Group Annual Report 2019 on 10 March 2020. This is available on TDC Groups' corporate website.	
General Disclosures	102-52	Reporting cycle	The performance content of this report is published annually. Please see reporting boundary on page 1 of TDC NET ESG Accounting Principles .	

General Disclosures	102-53	Contact point for questions regarding the report	Contact details for the report and further information is on our website.	
General Disclosures	102-54	Claims of reporting in accordance with the GRI Standards	This report has been prepared in accordance with the GRI Standards: Core option; see pages 30 and 104 of our Annual Report for the statement.	
General Disclosures	102-55	GRI content index	Our GRI content index is available on our corporate website.	
General Disclosures	102-56	External assurance	Our TDC NET ESG Accounting Principles are published online at our corporate website. Our data collection and reporting processes are reviewed for robustness and correctness and were assured by Deloitte prior to publication. Please see pages 104 and 105 for more information.	
General Disclosures	103	Management Approach	<p>The TDC Group sustainability strategy, which is based on material issues, guides our environmental, social and governance activities. The sustainability strategy is embedded in our business strategy and is approved by TDC Group Board of Directors. On an operational level, our Executive Management team is responsible for ensuring our targets are met, and the strategy and activities have been cascaded down throughout the entire organisation.</p> <p>The TDC Group Director of Sustainability is responsible for implementing the sustainability strategy in operations and achieving our KPIs. In this task, she is assisted by the Sustainability Team and a large network of employee ‘Sustainability Ambassadors’ who are located in teams and brands across TDC Group, TDC NET and Nuuday.</p> <p>In addition, our governance is supplemented by project- or topic-specific checks and balances, which are externally audited, and we strive to align our operations with international standards when applicable. For example, our environmental activities are tied to our ISO 14001 certified environmental management system, and our Occupational Health and Safety (OH&S) approach is tied to our ISO 45001 certified OH&S system. We also have an extensive range of issue-specific policies covering critical ESG risk areas such as: data protection, privacy and data ethics, anti-corruption, IT security, and our Code of Conduct. These have established lines of responsibility, culminating with the Board of Directors or the Audit Committee of the Board of Directors, that support</p>	

			<p>strong governance within ESG areas at TDC Group. Finally, our ESG reporting is assured by an external third-party assessor.</p> <p>We publish information related to our ESG activities in order to increase transparency and facilitate benchmarking by our owners, investors, suppliers and other interested parties. Our activities and performance are rated, as a part of TDC Group, by both GRESB and EcoVadis, and we seek to demonstrate year-on-year improvement.</p> <p>Please see ESG Framework at TDC Group on page 10, Materiality on page 11, and Engaging our Stakeholders on page 16 of the TDC Group Annual Report.</p>	
General Disclosures	103-1	Explanation of the material topic and its boundary	Please see page Materiality on page 11 of the TDC Group Annual Report.	
General Disclosures	103-2	The management approach and its components	We strive to align our operations with international standards when applicable. Currently, we have three ISO certifications across our business, covering environmental management, occupational health and safety, and IT security. Our activities and performance are rated by both GRESB and EcoVadis, and we seek to demonstrate year-on-year improvement. Please see ESG Framework at TDC Group on page 10, Materiality on page 11, and Engaging our Stakeholders on page 16 of the TDC Group Annual Report.	
General Disclosures	103-3	Evaluation of the management approach	We publish information related to our ESG activities in order to increase transparency and facilitate benchmarking by our owners, investors, suppliers and other interested parties. Our activities and performance are rated by both GRESB and EcoVadis, and we seek to demonstrate year-on-year improvement. Please see ESG Framework at TDC Group on page 10, Materiality on page 11, and Engaging our Stakeholders on page 16 of the TDC Group Annual Report.	
Economic Performance	201 (103-1, 103-2, 103-3)	Management Approach	Please see our Annual Report for information on our management approach to economic performance.	
Economic Performance	201-1	Direct economic value generated and distributed	Please see Financial statements starting on page 42 of our Annual Report. Also, see the 5-year overview on page 6 of the Annual Report.	We do not report figures for donations made.

Tax	207 (103-1, 103-2, 103-3)	Tax	As a leader in our industry, we are proud to contribute to the Danish economy, both directly and indirectly. To demonstrate our commitment to transparency, we have published our Tax Principles on the TDC Group website.	
Tax	207-1	Approach to tax	As a leader in our industry, we are proud to contribute to the Danish economy, both directly and indirectly. To demonstrate our commitment to transparency, we have published our Tax Principles on the TDC Group website.	
Energy	302 (103-1, 103-2, 103-3)	Management Approach	Please see page 27 of the Annual Report and page 3 and 4 of the TDC Group Sustainability Policy.	
Energy	302-1	Energy consumption within the organization	Please page 27 and the environmental data table on page 101 of our Annual Report and the TDC NET ESG Accounting Principles .	
Energy	302-4	Reduction of energy consumption	Please see page 27 of the Annual Report.	
Emissions	305 (103-1, 103-2, 103-3)	Management Approach	Please see page 27 of the Annual Report and page 3 and 4 of the TDC Group Sustainability Policy.	
Emissions	305-1	Direct (Scope 1) GHG emissions	Please see Climate & environment on page 27 and the environmental data table on page 101 of our Annual Report. Also please see the TDC NET ESG Accounting Principles .	
Emissions	305-2	Energy indirect (Scope 2) GHG emissions	Please see Climate & environment on page 27 and the environmental data table on page 101 of our Annual Report. Also please see the TDC NET ESG Accounting Principles .	
Emissions	305-3	Other indirect (Scope 3) GHG emissions	Please see Climate & environment on page 27 and the environmental data table on page 101 of our Annual Report. Also please see the TDC NET ESG Accounting Principles .	
Emissions	305-4	GHG emissions intensity	Please see the environmental data table on page 101 of our Annual Report. Also please see the TDC NET ESG Accounting Principles .	
Waste	306 (103-1, 103-2, 103-3)	Management Approach	Please see page 27 of the Annual Report and page 3 and 4 of the TDC Group Sustainability Policy.	
Waste	306-2	Management of significant waste-related impacts	Please see page 27 and the environmental data table on page 101 of our Annual Report. Also please see the TDC NET ESG Accounting Principles .	

Waste	306-3	Waste generated	Please see the environmental data table on page 101 of our Annual Report and the TDC NET ESG Accounting Principles .	
Waste	306-4	Waste diverted from disposal	Please see page 27 and the environmental data table on page 101 of our Annual Report. Also please see the TDC NET ESG Accounting Principles .	
Waste	306-5	Waste directed to disposal	Please see the environmental data table on page 101 of our Annual Report and the TDC NET ESG Accounting Principles .	
Occupational health and safety	403 (103-1, 103-2, 103-3)	Management Approach	Please see page 31 of our Annual Report.	
Occupational health and safety	403-1	Occupational health and safety management system	Please see page 31 of our Annual Report.	
Occupational health and safety	403-6	Promotion of worker health	Please see page 31 of our Annual Report.	
Occupational health and safety	403-9	Work-related injuries	Please see page 31 and the Occupational Health & Safety data table on page 102 of our Annual Report and the TDC NET ESG Accounting Principles .	
Training and education	404 (103-1, 103-2, 103-3)	Management Approach	Please see pages 31 and 32 of our Annual Report.	
Training and education	404-1	Average hours of training per year per employee	Please see the Employee training HR data table on page 103 of our Annual Report and the TDC NET ESG Accounting Principles .	This figure is not collected by gender or category.
Training and education	404-3	Percentage of employees receiving regular performance and career development reviews	Please see the HR data table on page 103 of our Annual Report and the TDC NET ESG Accounting Principles .	

Diversity and equal opportunity	405 (103-1, 103-2, 103-3)	Management Approach	Please see Diversity and Inclusion on page 33 of our Annual Report.	
Diversity and equal opportunity	405-1	Diversity of governance bodies and employees	Please see Gender Diversity in Management on page 33 and the Gender Representation - Board of Directors data table on page 102 of our Annual Report, as well as page 38 of the TDC Group Annual Report, and the TDC NET ESG Accounting Principles .	
Customer Privacy	418 (103-1, 103-2, 103-3)	Management Approach	Please see page 32 of our Annual Report.	
Customer Privacy	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Please see pages 19 and 20 of the TDC Group Annual Report.	

Other Material Issues	Reporting Location
Digital Skills (103-1, 103-2, 103-3)	Please see pages 28 and 29 and the Digital Denmark data table on page 103 of our Annual Report. Please also refer to the Materiality Matrix on page 11 of the TDC Group Annual Report.
Business Purpose (103-1, 103-2, 103-3)	Please see page 14 of our Annual Report. Please also refer to the Materiality Matrix on page 11 of the TDC Group Annual Report.
Innovation, Investment (103-1, 103-2, 103-3)	Please see pages 17 and 23 of our Annual Report. Please also refer to the Materiality Matrix on page 11 of the TDC Group Annual Report.
Cybersecurity (103-1, 103-2, 103-3)	Please see page 32 and the Digital Denmark data table on page 103 of our Annual Report. Please also refer to the Materiality Matrix on page 11 of the TDC Group Annual Report.
Good business behaviour (103-1, 103-2, 103-3)	Please see page 30 of our Annual Report. Please also refer to the Materiality Matrix on page 11 of the TDC Group Annual Report.
Customer Experience (103-1, 103-2, 103-3)	Please see pages 16, 19 and 20 of our Annual Report. Please also refer to the Materiality Matrix on page 11 of the TDC Group Annual Report.

Document	Link
----------	------

2020 Annual Report	https://tdcgroup.com/-/media/files/tdccom/documents/credit-report/2020/tdc-net-annual-report-2020.ashx
TDC NET ESG Accounting Principles (UK)	https://tdcgroup.com/-/media/files/tdccom/documents/responsibility/tdc-net-esg-accounting-principles.ashx
TDC Group Annual Report 2020	https://tdcgroup.com/-/media/files/tdccom/documents/credit-report/2020/tdc-annual-report-2020.ashx
TDC A/S Sustainability Policy (UK)	https://tdcgroup.com/-/media/files/tdccom/documents/responsability/tdc_sustainability-policy-2019-uk.ashx
TDC A/S Sustainability Policy (DK)	https://tdcgroup.com/-/media/files/tdccom/documents/responsability/sustainability-policy-2019-da.ashx
TDC A/S Whistleblower Policy (UK)	https://tdcgroup.com/-/media/files/tdccom/documents/responsibility/whistleblowing-tdc-october-2020.ashx
TDC A/S Whistleblower Policy (DK)	https://tdcgroup.com/-/media/files/tdccom/documents/responsibility/whistleblowing-tdc-oktober-2020.ashx
TDC A/S 2019 Annual Report (UK)	https://tdcgroup.com/-/media/files/tdccom/documents/credit-report/2020/upload10march/tdc-group-annual-report-2019-optimized.ashx
TDC A/S Partner Code of Conduct (UK)	https://tdcnet.com/media/b0mbvfdn/partner-code-of-conduct-for-tdc-group-dk-september-2018-reviewed-2019-2.pdf
TDC A/S Partner Code of Conduct (DK)	https://tdcnet.dk/media/b0mbvfdn/partner-code-of-conduct-for-tdc-group-dk-september-2018-reviewed-2019-2.pdf
TDC A/S Data Ethics Policy (UK)	https://tdcnet.com/media/zgvgtxto/tdc-politik-for-dataetik-2019.pdf
TDC A/S Data Ethics Policy (DK)	https://tdcnet.dk/media/zgvgtxto/tdc-politik-for-dataetik-2019.pdf
TDC A/S Anti-Corruption & Gift Policy (UK)	https://tdcgroup.com/-/media/files/tdccom/documents/responsibility/uk-policy-for-at-modtage-og-give-gaver-samt-deltagelse-i-arrangementer---tdccom.ashx
TDC A/S Anti-Corruption & Gift Policy (DK)	https://tdcgroup.com/-/media/files/tdccom/documents/responsibility/dk---policy-for-at-modtage-og-give-gaver-samt-deltagelse-i-arrangementer---tdccom.ashx
Privacy (UK)	https://tdcnet.com/privacy-notice/
Privacy (DK)	https://tdcnet.dk/persondatameddelelse/